

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

JOHN DOE,

Plaintiff,

v.

WASHINGTON AND LEE
UNIVERSITY,

Defendant.

Civil Action No.:
6:19-cv-00023

JOINT RULE 26(F) REPORT AND DISCOVERY PLAN

Plaintiff John Doe (“Plaintiff”) and Defendant Washington and Lee University, by and through their counsel, submit the following report and proposed discovery plan pursuant to Rule 26(f) of the Federal Rules of Civil Procedure.

1. **Rule 26(f) Conference.** Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, counsel for Plaintiff, Andrew S. Gallinaro and David G. Harrison, and counsel for Defendant, Micah B. Schwartz, held a telephone conference on July 25, 2019, during which they discussed the topics in Item Nos. 2 through 8 below.

2. **Initial Disclosures.** The parties jointly propose the following schedule for initial disclosures, which are the dates set forth in the pretrial order entered July 16, 2019: Information required by Rule 26(a)(1)(A) shall be provided by August 15, 2015.

3. **Initial Expert Disclosures.** The parties jointly propose the following schedule for initial expert disclosures, which revise the dates set forth in the pretrial order entered July 16, 2019:

- a) Information required by Rule 26(a)(2)(A) shall be provided by plaintiff by September 30, 2019.
- b) Information required by Rule 26(a)(2)(A) shall be provided by defendant by October 30, 2019

4. **Discovery Plan.** The parties jointly propose the following discovery plan:

- a) All discovery shall be governed by the Federal Rules of Civil Procedure.
- b) Plaintiff's reports from retained experts (if any) required by Rule 26(a)(2) and damages computations shall be due by November 20, 2019.
- c) Defendant's reports from retained experts (if any) required by Rule 26(a)(2), including damages analysis shall be due by December 20, 2019.
- d) Plaintiff's rebuttal reports from retained experts (if any) required by Rule 26(a)(2) shall be due by January 20, 2020.
- e) All fact and expert discovery shall be completed by February 15, 2020.

5. **Electronic Discovery Plan.** The parties jointly propose to submit electronic discovery in the form of requests for production of documents in the normal course of discovery. The parties agree to produce electronic documents in PDF format. The parties will present to the court a consent confidentiality order for sensitive and confidential documents.

6. **Discovery Limits.** The parties agree to abide by the discovery limits set forth in the Federal Rules of Civil Procedure.

7. **Amendment and Joinder.** The plaintiff shall have until August 30, 2019 to amend his complaint and to join additional parties, and the defendant shall have 21 days from service of any amended complaint to file motions or responsive pleadings with respect thereto.

8. **Filing of Dispositive Motions.** Dispositive motions shall be filed on or before March 15, 2020.

Dated: July 30, 2019

Respectfully Submitted

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